

**ENDORSED**

First Judicial District Court

[2-201, 3-201]

AUG - 5 2010

STATE OF NEW MEXICO

IN THE First Judicial District COURT  
Santa Fe COUNTYNo. D101CV 2010008792  
Santa Fe, Rio Arriba & Los Alamos Counties  
Santa Fe, NM 87504-2288Rodrigo Carrasco, Plaintiffagainst  
Commercial Alliance Insurance CompanyCommercial Alliance Insurance Company, Defendant415 Lockhaven Dr., AddressHouston TX. 7703, CityInsured Transportes Sotoe Hijos  
Driver Hector Manuel Acosta.Date of Loss June 14 2006  
1160 Joe Battle Effort TexasCIVIL COMPLAINT 79936

1. Plaintiff or defendant resides, or may be found in, or the cause of action arose in this county.
2. Plaintiff claims from Defendant the amount of \$ 250,000<sup>00</sup> and also claims interest and court costs.

Plaintiff claims from Defendant personal property of the value of \$ 250,000<sup>00</sup>, which is described as follows: Medical bills, lost wages, pain and suffering, future medical expenses and possible surgical operations. Loss of relationship with spouse, other out of pocket expenses due to my injuries

3. Plaintiff's claim arises from the following event or transaction:

4. Trial by jury is (not) demanded. (If a jury is demanded, an additional cost must be paid upon filing.)

08-05-2010  
Date

Signed

Rodrigo CarrascoRodrigo Carrasco  
Name (print)4180 Chaparron place  
Address (print)Santa Fe New Mexico 87507  
City, State and Zip Code (print)(505) 470 8970  
Telephone Number

[As amended, effective January 1, 1995.]

**EXHIBIT**A

August 4, 2010

Rodrigo Carrasco  
4180 Chaparron Place  
Santa fe NM, 87507

Vs.

CAIC Insurance USA  
Michelle Ornelas Claim Representative  
Certificate No. CF1-112216  
415 Lockhaven Dr.  
Houston TX, 77073  
Transportes Soto e Hijos C.V. Insured  
1160 Joe Battle  
El Paso TX, 79936

Honorable Judge,

I, Rodrigo Carrasco, was in an accident on June 14, 2006 with a semi-truck from Transportes Soto e Hijos. Transportes Soto e Hijos has been neglecting to pay the damages caused from that accident. Recently I found out that the semi-truck was insured by CAIC Insurance USA. They have been neglecting to release any kind of information to me so I ask if you can give me a hearing of 15 minutes so I can make a claim of 250,000.00 dollars. This is the amount of money I ask for damages to my truck, medical expenses, surgeries, medicines, failure of child support, and other expenses. The semi-truck of Transportes Soto e Hijos invaded my lane directly to me. The accident happened 4.9 miles from the border on an International Entrance Port in Juarez, Mexico as indicated on policy PC0004724. Coverage's are valid within 50 miles from the Entrance Port of the insured Transportes Soto as stated in article 3 from the Public Law 96-296. The semi-truck was responsible for the accident and I would appreciate if you can help me get justice. Honorable Judge, thank you for your time.

Sincerely,

*Rodrigo Carrasco* August 5, 2010

Rodrigo Carrasco

July 14, 2010  
Rodrigo Carrasco  
4180 Chaparron Place  
Santa fe NM, 87507

Vs.

CAIC Insurance USA  
RE: Insured Transportes Soto E Hijos S.A. de C.V.  
driver, Hector Manuel Dominguez Acosta  
Certificate No. C.F1-1122116  
Date of Loss June 14, 2006

Dear Michelle Ornelas,

In the Federal law of the USA, it has been permitted to free commerce with the condition that the trucks have to be insured with in the border of Mexico. They are insured as long as they are with in 25-50 miles past the order and have to be on Port of Entrance. The accident that happened on June 14, 2006 was 4.9 miles away from the border of Mexico and it was on a Port of Entrance. I would like to receive a copy of the correct policy and what it covers for Transportes Soto e Hijos. If in two weeks we don't reach to an agreement or I don't receive the information I asked for, I will make a civil claim in the state of New Mexico for 250,000.00 dollars at the First Judicial Court County of Santa Fe. Thank you for your attention.

Sincerely,

*Rodrigo Carrasco J. July 15 2010*

Rodrigo Carrasco J.  
Cell Phone (505)470-8970

*470-89-70*

FIRST JUDICIAL DISTRICT COURT  
STATE OF NEW MEXICO  
COUNTY OF Santa Fe

**FILED**  
First Judicial District Court

AUG - 5 2010

Rodrigo Carrasco  
Petitioner,

Santa Fe, Rio Arriba &  
Los Alamos Counties  
PO Box 2268  
Santa Fe, NM 87504-2268

Imp

vs.

Case No. D101CV201002790

Commercial Alliance Insurance Company.  
Respondent.

## REQUEST FOR HEARING

1. Type of case: NON JURY
2. Judge to whom assigned: Barbara J. Vigil
3. Are there any hearings presently set? ☐ Yes ☒ No  
If yes, when? \_\_\_\_\_
4. Specific matters to be heard [ for example, "alimony" or "Motion to Enforce", etc.]:  
\_\_\_\_\_
5. Estimated total time required for hearing all parties and witnesses: 15 minutes.

Rodrigo Carrasco  
Signature

Mailing Address for Other Party <u>Commercial Alliance Insurance Company</u> <u>415 Lockhaven Dr.</u> <u>Houston TX. 77073.</u> <u>(713) 960 1214</u>
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<u>Rodrigo Carrasco</u> Print Name <u>4150 Chaparron Place</u> Print Address <u>Santa Fe New Mexico 87507</u> Print City/State/Zip <u>(505) 470 8970</u> Telephone
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Other Party's Attorney _____ _____ _____
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**Remember: It is Your Obligation to Promptly Mail or Serve a Copy to the Other Party**

RECEIVED

AUG 09 2010

STATE OF NEW MEXICO  
FIRST JUDICIAL DISTRICT COURT  
COUNTY OF Santa Fe

Rodrigo Carrasco, Plaintiff

VS.

No. D101CV201002790

Comercial Alliance Insurance Company Defendant

SUMMONS

THE STATE OF NEW MEXICO

TO: Comercial Alliance Insurance Company Defendant  
ADDRESS: 415 Lockhaven Dr. Houston Texas 77073  
GREETINGS:

You are hereby directed to serve a pleading or motion in response to the complaint within thirty (30) days after service of this summons, and file the same, all as provided by law.

You are notified that, unless you serve and file a responsive pleading or motion, the plaintiff will apply to the court for the relief demanded in the complaint.

Attorney or attorneys for plaintiff:

Address of attorneys for plaintiff:  
(or of plaintiff, if no attorney)

4180 Chaparral place.  
Santa Fe New Mexico 87507  
(505) 470 8920

Barbara J. Vigil

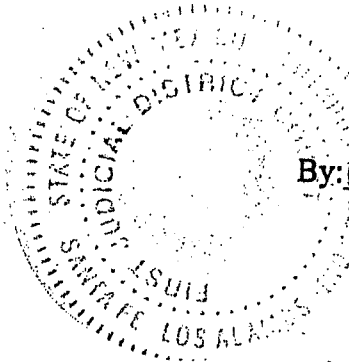
WITNESS the Honorable \_\_\_\_\_, district judge of the FIRST  
judicial district court of the State of New Mexico, and the seal of the district court of  
SANTA FE County, this 5th day of AUGUST, 20 10.

STEPHEN T. PACHECO

Clerk of the Court

By: Janice M. Pachecho

Deputy



(check one box and fill in appropriate blanks)

☐ [to Defendant \_\_\_\_\_ (used when Defendant receives copy of Summons or refuses to receive Summons)]

☐ [to \_\_\_\_\_, a person over fifteen (15) years of

age and residing at the usual place of abode of Defendant \_\_\_\_\_, who at the time of such service was absent therefrom.]

☐ [by posting a copy of the Summons and Complaint in the most public part of the premises of Defendant \_\_\_\_\_ (used if no person found at dwelling house or usual place of abode)]

☐ [to \_\_\_\_\_, an agent authorized to receive service of process for Defendant

\_\_\_\_\_ (to \_\_\_\_\_, (parent) (guardian) of Defendant \_\_\_\_\_ ( used when Defendant is a minor or an incompetent person)

☐ [to \_\_\_\_\_ (name of person), \_\_\_\_\_, (title of person authorized to receive service) (used when Defendant is corporation or association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision)

Fees:

\_\_\_\_\_  
Signature of Person Making Service

\_\_\_\_\_  
Title (if any)

\*Subscribed and sworn to

before me this \_\_\_\_\_

day of \_\_\_\_\_, 19\_\_\_\_\_

\_\_\_\_\_  
Judge, Notary or Other Officer  
Authorized to Administer Oaths

\_\_\_\_\_  
Official Title

\*If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

[Adopted effective August 1, 1988.]

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